

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN**

INTERVARSITY CHRISTIAN
FELLOWSHIP/USA, *et al.*,

Plaintiffs,

v.

BOARD OF GOVERNORS OF
WAYNE STATE UNIVERSITY, *et*
al.,

Defendants.

Civil Action No. 3:19-cv-10375-RHC-
SDD

Judge Robert H. Cleland

**FACT APPENDIX IN SUPPORT
OF PLAINTIFFS' MOTION
FOR PARTIAL SUMMARY
JUDGMENT AND
PERMANENT INJUNCTION**

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Index of Exhibits

<u>Exhibit</u>	<u>Description</u>
A	Ann Beyerlein Declaration
A1	History of InterVarsity Christian Fellowship (IVCF)
A2	Purpose of IVCF
B	Daniel Blomberg Declaration
B1	2018-2019 RSO Registrations Spreadsheet*
B2	2018-2019 RSO New Registrations V1 Spreadsheet*
B3	2018-2019 RSO New Registrations V2 Spreadsheet*
B4	2018-2019 RSO Existing Registration Spreadsheet*
B5	2019-2020 Existing Club Sports Spreadsheet*
B6	2019-2020 Existing Fraternities and Sororities Spreadsheet*
B7	2019-2020 Existing RSO Spreadsheet*
B8	2019-2020 New RSO Spreadsheet*
B9	Defs' 1-21-2020 Answers to Plfs' First Set of Interrogs.
B10	Defs' 3-19-2020 Amend. Resp. to Plfs' First Set of Interrogs.
B11	Defs' 5-1-2020 Amend. Resp. to Interrog. 12
B12	Defs' 9-19-2020 Second Amended Response and Objections
B13	WSU Webpage Re: How to Re-register a Student Organization
B14	WSU Webpage Re: Statistics on WSU Fraternities and Sororities
B15	WSU Webpages Re: DOSO and the RSO Program
B16	Various WSU RSO Constitutions

* Exhibits marked with an asterisk have been filed by leave in the traditional manner.

- B17** Email Regarding WSU Cancellations of IVCF Meeting-Space
- B18** Correspondence Between IVCF & WSU, 12-2017 and 01-2018
- B19** WSU Info Re: WSU Scholarships and Women's Programs
- B20** WSU Info Re: Veteran Resource Center, Women's Programs
- B21** Flyers Distributed by IVCF at WSU to Advertise Activities
- B22** Information Re: WSU Scholarships
- B23** Email from Tom Lin, IVCF Pres., to Louis Lessem, WSU GC
- B24** WSU Student Organization Rosters from 1937-1949
- B25** Alexandra Fluegel, *WSU Christian Group Reinstated After Suing for Discrimination*, Detroit Metro Times (March 9, 2018)
- B26** Ann Zaniewski, *Wayne State University Re-certifies Christian Student Group InterVarsity*, Detroit Free Press (March 8, 2018)
- B27** IYSSE Statement of Principles

- C** Ricardo Villarosa Deposition
- C1** WSU Student Organization Resources Webpage (Dep. Ex. 2)
- C2** WSU Student Veterans Organization Constitution (Dep. Ex. 3)
- C3** OrgSync RSO Reg. Spreadsheet* (Dep. Ex. 5)
- C4** 2018-2019 School Year RSO Reg. Submissions* (Dep. Ex. 6)
- C5** WSU Non-Discrim./Affirmative Action Policy (Dep. Ex. 7)
- C6** WSU Women's Resources Webpage (Dep. Ex. 8)
- C7** WSU Fraternity and Sorority Webpage (Dep. Ex. 10)
- C8** Spring 2017 Rejected InterVarsity Constitution (Dep. Ex. 12)
- C9** Fall 2017 Rejected InterVarsity Constitution (Dep. Ex. 13)
- C10** WSU Ass't GC Sarah A. Luke Letter (Dep. Ex. 16)
- C11** Letter from IVCF President Tom Lin to WSU (Dep. Ex. 17)

D David Strauss Deposition

E Ryan Mitchell Deposition

F Ann Beyerlein Deposition

G Cristina Garza Declaration (with Exhibits 1-4)

H Douglas LaRowe Declaration